

Ronald L.M. Goldman, Esq. (State Bar No. 33422)
rgoldman@baumhedlundlaw.com
Diane Marger Moore, Esq. (*Pro Hac Vice*)
dmargermore@baumhedlundlaw.com
BAUM HEDLUND ARISTEI & GOLDMAN, PC
10940 Wilshire Boulevard, 17th Floor
Los Angeles, California 90024
Telephone: (310) 207-3233
Facsimile: (310) 820-7444

*Attorneys for Creditors,
Majesti Mai Bagorio, et al.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF RONALD L.M.
GOLDMAN IN SUPPORT OF NOTICE OF
JOINDER IN MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
PURSUANT TO 11 U.S.C. §§ 105(a) AND 501
AND FED. R. BANKR. P. 3003(c) FOR
ENTRY OF ORDER EXTENDING THE BAR
DATE**

Date: November 13, 2019

Time: 9:30 a.m. (Pacific Time)

**Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102**

Objection Deadline: November 6, 2019

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1. I am a senior shareholder at Baum Hedlund Aristei Goldman, attorneys of record for creditors Majesti Mai Bagorio, et al herein. I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently thereto, under oath.

3. In addition to the grounds urged by the Official Committee Of Tort Claimants for extending the bar date to January 31, 2020 for fire victims to file proofs of claim, it is my experience that people are still trying to cope with claims and claims adjusters, and coming to us as late as today. They had no clear warning about the deadlines since they were not represented. We have clients who were surprised to learn that they had little time left to file. The magnitude of the tragedy and the total displacement of people and their lives - many having lost their home and virtually everything they owned and cherished, some having been rendered homeless by loss of job in addition to loss of home -- has placed them at a disadvantage when it comes to trying to put their lives back together, on the one hand, and taking steps to protect their rights on the other.

Ronald L.M. Goldman

1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to the within cause. My business address is
3 Baum Hedlund Aristei Goldman, 10940 Wilshire Boulevard, 17th Floor, Los Angeles, California
4 90024. On this day, October 19, 2019, I served the following document(s) in the manner described
below:

5 **DECLARATION OF RONALD L.M. GOLDMAN IN SUPPORT OF NOTICE OF**
6 **JOINDER IN MOTION OF THE OFFICIAL COMMITTEE OF TORT CLAIMANTS**
7 **PURSUANT TO 11 U.S.C. §§ 105(a) AND 501 AND FED. R. BANKR. P. 3003(c) FOR**
ENTRY OF ORDER EXTENDING THE BAR DATE

8 X **VIA ECF:** I caused the aforementioned documents to be filed via the Electronic Case
9 Filing (ECF) system in the United States Bankruptcy Court for the Northern District of
10 California, on all parties registered for e-filing in Case Number Case No. 19-30088 (DM).
Counsel of record are required by the Court to be registered e-filers, and as such are
automatically e-served with a copy of the documents upon confirmation of e-filing.

11 I declare under penalty of perjury, under the laws of the United States of America, that the
12 foregoing is true and correct. Executed on October 21, 2019.

13
14 *Diane Marger Moore*
15 DIANE MARGER MOORE